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BY ECF

Honorable Katharine H. Parker
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Suite 1950
New York, New York 10007

**Re: *City of Almaty, Kazakhstan, et ano. v. Mukhtar Ablyazov, et al.*,
Case No. 15 Civ. 5345 (AJN) (KHP)**

Dear Judge Parker:

We represent plaintiffs City of Almaty, Kazakhstan and BTA Bank (“the Kazakh Entities”). We write to close the evidentiary record for the Kazakh Entities’ motion for sanctions against Ilyas Khrapunov for leaking the confidential transcript of the deposition testimony of Kenes Rakishev.

At the February 12, 2018 oral argument on plaintiffs’ motion for sanctions, the Kazakh Entities offered portions of the deposition testimony of Ilyas Khrapunov, including as part of a demonstrative including video and quotations from that testimony. Because that deposition testimony has been designated confidential, the Kazakh Entities are couriering to chambers a computer disc including the video of the relevant sections of testimony offered by plaintiffs and the accompanying pages of the confidential transcript. Specifically, this includes pages 27, 35-37, 69-70, 99, 238-240 of day one of Ilyas Khrapunov’s deposition testimony, and pages 122-123 of day two of Viktor Khrapunov’s deposition testimony. This testimony completes the Kazakh Entities’ submission of evidence in support of their motion for sanctions.

At oral argument, the Court also granted the Khrapunovs permission to offer counter-designated portions of Ilyas Khrapunov’s deposition testimony, which they submitted on February 16, 2018. [ECF No. 547]. As the Court noted, the testimony of Ilyas Khrapunov was the only outstanding evidence at the close of the November 17, 2017 evidentiary hearing. Now that his testimony has been offered by both sides, the plaintiffs respectfully submit that the evidentiary record on the motion for sanctions is complete.

Respectfully,

/s/ Matthew L. Schwartz
Matthew L. Schwartz